

EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF OKLAHOMA**

SEAN SMITH and CRYSTAL SMITH,)

Plaintiffs,)

v.)

CSAA FIRE AND CASUALTY)

INSURANCE COMPANY and)

LISA HOLLIDAY,)

Defendants.)

Case No.: CIV-17-1302-D

(Formerly Payne County District Court

Case No. CJ-2017-501)

**CSAA FIRE AND CASUALTY COMPANY'S FIRST SET OF INTERROGATORIES,
REQUESTS FOR PRODUCTION OF DOCUMENTS AND REQUESTS
FOR ADMISSION TO PLAINTIFF, SEAN SMITH**

TO: Sean Smith

Steven S. Mansell, OBA No. 10584

Mark A. Engel, OBA No. 10796

Kenneth G. Cole, OBA No. 11792

M. Adam Engel, OBA No. 32384

MANSELL ENGEL & COLE

101 Park Avenue, Suite 665

Oklahoma City, Oklahoma 73102-7201

ATTORNEYS FOR PLAINTIFFS

Pursuant to 12 O.S. §§ 3226, 3233, 3234 and 3236, Defendant, CSAA Fire and Casualty Company ("CSAA"), serves the following Interrogatories and requests that Plaintiff, Sean Smith, ("Plaintiff"), answer the Interrogatories separately, fully, under oath and in writing, answer the Requests for Production separately, fully, under oath and in writing, and produce for inspection and copying all requested Documents in Plaintiff's possession or control, all within thirty (30) days from the date of service hereof and in accordance with the Instructions and Definitions set out below.

REQUEST FOR PRODUCTION NO. 5. Produce all photographs or videos that depict, to any degree, the damage You attribute to the Incident giving rise to this lawsuit.

REQUEST FOR PRODUCTION NO. 6. Produce all photographs and videos that depict, to any degree, the subject property prior to the Incident giving rise to this lawsuit. NOTE: Your production should include all photographs depicting the exterior and the interior of the subject property, regardless of the reason the photograph or video was taken and whether said photographs depict the claimed damage or not.

REQUEST FOR PRODUCTION NO. 7. Produce any and all statements, whether recorded or written, taken by You or on Your behalf, of this Defendant, including its agents or employees.

REQUEST FOR PRODUCTION NO. 8. Produce any and all statements, whether recorded or written, taken by You or on Your behalf, of any witness who may have knowledge of any of the allegations made in Your Petition.

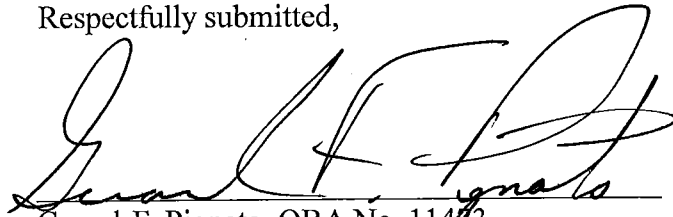
REQUEST FOR PRODUCTION NO. 9. Produce all records, including, but not limited to, diaries, logs, and notes prepared by You, including Your representatives and/or family members which depict the nature and extent of Your loss, the claim-related activity following said loss, and/or the nature and extent of Your damages.

REQUEST FOR PRODUCTION NO. 10. Produce all non-Privileged Documents that You relied upon for purposes of responding to Defendant's Interrogatories to You.

REQUEST FOR PRODUCTION NO. 11. Please produce copies of all Documents that relate to any financial loss You allege occurred as a result of Defendant's purported breach of its contract with Plaintiffs.

REQUEST FOR PRODUCTION NO. 12. Please produce any and all Documents which relate to any financial loss You allege occurred as a result of Defendant's purported "bad faith."

Respectfully submitted,



Gerard F. Pignato, OBA No. 11473

R. Greg Andrews, OBA No. 19037

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**ATTORNEYS FOR DEFENDANT,
CSAA FIRE AND CASUALTY INSURANCE
COMPANY**

CERTIFICATE OF SERVICE

This is to certify that on the 16 day of February 2018, a true and correct copy of the
above and foregoing instrument was forwarded to:

Via Email

Steven S. Mansell, OBA #10584

Mark A. Engel, OBA #10796

Kenneth G. Cole, OBA #11792

M. Adam Engel, OBA #32384

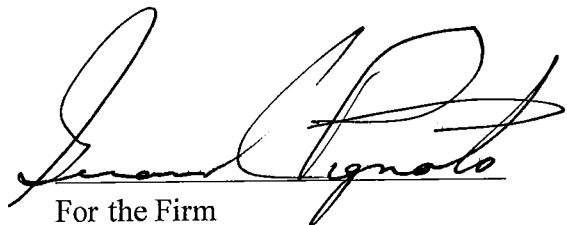
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For the Firm